

to William Allerton and Mary E.
Boyer, joint tenants, dated January *
10, 1964, and recorded among the *
Land Records of Frederick County *
at Liber 697, folio 585

RESPONDENTS

* * *

BILL OF COMPLAINT

Fred B. Abeles, General Partner, A. T. P. Company, by his attorneys,
F. Theodore Elliot, and Elliot, Nicklas and Castle, alleges:

1. That Certificate of Sale No. 992 attached hereto as "Exhibit A" and
hereby made a part of this Bill was issued by the Collector of Taxes for Frederick
County, State of Maryland, on November 10, 1980.

2. The real property sold by virtue of said Certificate is located in
Middletown District, and is described therein as Lot 0.38 acre & improvements,
W/S Shank Road, near Bolivar, Frederick County, Maryland, and further described
in a deed from Ruth G. Zimmerman, widow, to William Allerton and Mary E.
Boyer, joint tenants, dated January 10, 1964, and recorded among the Land
Records of Frederick County at Liber 697, folio 585.

3. The property has not been redeemed by any party in interest,
although more than one (1) year from the date of sale has expired.

4. A statement of the amount necessary to redeem the aforesaid
property, prepared by the Collector, is "Exhibit B", annexed hereto and hereby
made a part of this Bill.

WHEREFORE, your Complainant prays:

A. That the Court subpoena William Allerton, Mary E. Boyer, Nelson
Deckelbaum, Trustee, Ira C. Wolpert, Trustee, George W. Carter, Jr. Resident
Agent for The Peoples Finance Company, Martha Ann Brittain, Frederick County
Treasurer, and Lumen F. Norris, Supervisor of Assessments of Frederick County,
Maryland, Respondents, to answer this Bill of Complaint.

B. That the Court order issuance of an Order of Publication, according
to Article 81, Section 107, Maryland Annotated Code.